

Franklin Memorial Hospital)	Departmental
Franklin County)	Findings of Fact and Order
Farmington, Maine)	Air Emission License
A-359-71-F-A)	Amendment #1
)	After-the-Fact

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Franklin Memorial Hospital (FMH) of Farmington, Maine was issued Air Emission License A-359-71-E-R on August 2, 1999 permitting the operation of emission sources associated with their healthcare facility.

FMH has requested an amendment to their license in order to:

- Replace the previously licensed 475 kW Emergency Generator with a 300 kW emergency unit; and,
- Install a new 600 kW Emergency Generator.

B. Emission Equipment

The following equipment will be added to the license:

New Equipment

Equipment	Power Output (kW)	Maximum Capacity (lb/MMBtu)	Maximum Firing Rate (gal/hr)	Fuel Type, % Sulfur
Emergency Unit #2	300	3.2	22.4	#2, 0.35%
Emergency Unit #3	600	6.1	43.6	#2, 0.35%

Diesel Unit #1 (475 kW, 38 gal/hr) is to be **removed** from the license.

C. Application Classification

The modification of a minor source is considered a major modification based on whether or not expected emission increases exceed the "Significant Emission

Levels” as given in Maine’s Air Regulations. This modification is determined to be a minor modification and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas. BPT for an after-the-fact amendment requires an analysis similar to a Best Available Control Technology analysis per Chapter 115 of the Department’s regulations.

A. Emergency Generators

FMH has applied to replace Diesel Unit #1 with 300 kW Emergency Generator #2, and to add Emergency Generator #3, a 600 kW unit to their license. Each unit will operate in an emergency capacity, and as such will each be limited to 500 hours of operation per year on a 12 month rolling total. The generators share a fuel tank with FMH’s boilers; thus they will fire #2 fuel oil with a sulfur content not to exceed 0.35% by weight.

BPT for the Emergency Generators is the following:

1. The firing of #2 fuel oil with a sulfur content not to exceed 0.35%.
2. Operation limited to 500 hours per generator per year on a 12 month rolling total.
3. PM emission limits meet MEDEP Ch. 101 standards for particulate emissions from fuel burning equipment larger than 3 MMBtu/hr. PM₁₀ limits for the generators are derived from the PM limits.
4. NO_x, CO and VOC emission limits are based on AP-42 data for distillate oil fired generators dated 10/96.
5. Visible emissions from each stack of Emergency Generators #1 and #2 shall each not exceed 20% opacity on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period.

B. Annual Emissions Restrictions

The total allowable annual emissions for FMH are calculated based on 500 hours of operation per 12-month rolling year for Emergency Generators #2 and #3, and continuous operation of Boilers #1 and #2, previously licensed in A-359-71-E-R.

Total Allowable Annual Emission for the Facility
(used to calculate the annual license fee)

<u>Pollutant</u>	<u>Boilers</u>	<u>Emergency Generator #2</u>	<u>Emergency Generator #3</u>	<u>Tons/Year</u>
PM	13.9	0.10	0.19	14.19
PM ₁₀	13.9	0.10	0.19	14.19
SO ₂	34.9	0.28	0.54	35.72
NO _x	10.6	3.46	4.88	18.94
CO	1.40	0.75	1.30	3.45
VOC	0.35	0.28	0.13	0.76

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License Amendment A-359-71-F-A, subject to the conditions found in Air Emission License A-359-71-E-R, and in the following conditions:

The following replaces Conditions (17) and (19) in license A-359-71-E-R:

- (17) Emergency Generators #2 and #3
- (i) Emergency Generators #2 and #3 shall each be limited to 500 hours of operation per 12-month rolling year. Compliance shall be demonstrated by hour meters operated and maintained on the generators.
 - (ii) Emergency Generators #2 and #3 shall each fire #2 fuel with a sulfur content not to exceed 0.35% by weight. Compliance shall be demonstrated through fuel receipts showing the sulfur content of the fuel.
 - (iii) FMH shall operate Emergency Generators #2 and #3 only during emergency situations as defined in Condition (21) and for short periods of time to exercise the engines and ensure that the generators are in good working order. A log shall be maintained documenting the dates, times and reason of operation each time an emergency generator is operated.
 - (iv) Emissions from the generators shall not exceed the following:

Franklin Memorial Hospital
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Emergency Generator Emission Limits

	Generator #2 (lb/hr)	Generator #3 (lb/hr)
PM	0.38	0.74
PM₁₀	0.38	0.74
SO₂	1.11	2.15
NO_x	13.84	19.6
CO	2.99	5.19
VOC	1.10	0.50

Compliance shall be demonstrated on request of the Department through stack testing in accordance with the appropriate method found in 40 CFR Part 60, Appendix A.

- (v) Emergency Generators #2 and #3 shall each not exceed a particulate limit of 0.12 lb/MMBtu.
- (vi) Visible emissions from each stack of Emergency Generators #1 and #2 shall each not exceed 20% opacity on a 6-minute block average basis, except for no more than two 6-minute block averages in a 3-hour period.

The following are new Conditions:

- (21) From MEDEP Chapter 100:
“Emergency” means for the purposes of Chapter 115, any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology based emission limitation under the license, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- (22) FMH shall pay the annual air emission license fee within 30 days of March 31 of each year. Pursuant to 38 MRSA §353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under 38 MRSA §341-D, subsection 3.

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(23) This amendment shall expire concurrently with Air Emission License A-359-71-E-R.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: April 11, 2003

Date of application acceptance: May 12, 2003

Date filed with the Board of Environmental Protection: _____

This Order prepared by Rachel E. Pilling, Bureau of Air Quality